



Certified Mail No.

Activity No.: PER20140001  
Agency Interest No. 4634

Mr. Morgan B. Wolfe  
Vice President of Operations  
LOOP LLC – Port Complex  
137 Northpark Blvd.  
Covington, Louisiana 70433-5071

RE: Part 70 Operating Permit Renewal and Modification  
LOOP LLC - Port Complex  
Galliano, Lafourche Parish, Louisiana

Dear Morgan B. Wolfe:

This is to inform you that the permit modification and renewal for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_\_ of \_\_\_\_\_, 2020, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2015.

Permit No.: 1560-00027-V1

Sincerely,

Tegan B. Treadaway  
Assistant Secretary

c: EPA Region VI

**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**LOOP LLC - Port Complex**  
**Agency Interest No.: 4634**  
**LOOP LLC**  
**Galliano, Lafourche Parish, Louisiana**

**I. Background**

LOOP LLC - Port Complex consists of pipeline terminal facilities existing in Galliano and Leeville located in Lafourche Parish. The LOOP LLC - Port Complex currently operates under Permit No. 1560-00027-V0, issued May 2, 2011.

**II. Origin**

A permit application and Emission Inventory Questionnaire were submitted by LOOP LLC on December 29, 2014 requesting a Part 70 operating permit. Additional information dated April 27, 2015 was also received.

**III. Description**

The LOOP LLC – Port Complex consists of the Clovelly Dome Storage Terminal in Galliano, the Small Boat Harbor in Leeville, the Fourchon Booster Station in Leeville, and the Marine Offloading Terminal in Grand Isle Block 59 of the Gulf of Mexico. The Clovelly Dome Storage Terminal consists of nine underground storage caverns. These caverns provide storage for crude oil prior to pipeline delivery. Eight of the caverns have a capacity of approximately 7 MM barrels of oil, and one cavern has a capacity of 4 MM barrels of oil. There are 15 existing crude oil storage tanks with a capacity of 600,000 bbl each. The terminal also consist of surface facilities located in the same general vicinity which include a Brine Storage Reservoir, Operations Building, crude oil storage tanks, fuel and slop oil tanks, a turbine generator, and ancillary equipment. The Small Boat Harbor, which is located on Bayou Lafourche, shelters crew and work boats and includes hose testing facilities. The Fourchon Booster Station is a secured unmanned facility with two large diesel storage tanks and a few small storage tanks. Emission control systems utilized at the LOOP Complex facilities include the latest storage tank technology, mechanical seals on pumps, and low sulfur fuel oil.

LOOP LLC proposes to expand its Clovelly Dome Storage Terminal as follows:

1. Add six (6) 371,000 bbl crude oil storage tanks (Emission Point Nos. 22-14 through 27-14);
2. Increase the tank landings from the previous calculated basis of 26 per year to a calculated basis of 90 tank landings per year;
3. Delete 5 permitted tanks that were never constructed. and adjust the landing losses in the existing cap (Emission Point TANK CAP);
4. Update the Tank Cap emissions basis to include one tank cleaning per year;

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5. Update the Tank Cap emissions basis from the previous throughput of 182.5 MMbbl/year to 200 MMbbl/year;
6. Reconcile the size of the 8 larger caverns from the previous 6MMbbl to an actual value of about 6.85 MMbbl, and the smaller cavern from 3 MMbbl to 4 MMbbl;
7. Add PM<sub>2.5</sub> emissions to the 16 currently permitted engines;
8. Update the emission calculations for the caverns based on converting the EPA WATER9 calculation from version 2 to version 3.
9. Update the insignificant activities based on the audit and to reconcile for lab activities.
10. Reduce engine operating hours from 500 per year to 100 per year.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	2.34	0.49	-1.85
PM <sub>2.5</sub>	-	0.49	+0.49
SO <sub>2</sub>	1.88	0.43	-1.45
NO <sub>x</sub>	51.23	10.15	-41.08
CO	10.01	2.24	-7.77
VOC **	182.59	437.54	+ 254.95

<b>**VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):</b>			
<b>Pollutant</b>	<b>Before</b>	<b>After</b>	<b>Change</b>
2,2,4-Trimethylpentane	-	0.22	+0.22
Benzene	1.20	2.60	+1.40
Cumene	0.03	0.04	+0.01
Ethyl benzene	0.15	0.26	+0.11
n-Hexane	1.12	2.73	+1.61
Toluene	0.66	1.39	+0.73
Xylenes	0.44	0.76	+0.32
<b>Total</b>	<b>3.70</b>	<b>8.00</b>	<b>+4.30</b>
<b>Other VOC</b>	<b>178.89</b>	<b>429.54</b>	<b>+250.65</b>

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**IV. Type of Review**

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP) and Prevention of Significant Deterioration (PSD).

This facility is a minor source of toxic air pollutants (TAPs) under LAC 33:III.Chapter 51 and an area source under the federal requirements.

**V. Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**VI. Public Notice**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge and in *The Lafourche Gazette* in Lafourche Parish on June \*\*, 2015. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on June \*\*, 2015. The draft permit was also submitted to US EPA Region VI on June \*\*, 2015. All comments will be considered prior to the final permit decision.

**VII. Effects on Ambient Air**

Emissions associated with the proposed modification were reviewed by LDEQ to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

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Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
NA			

**VIII. General Condition XVII Activities**

		Emission Rates - tons				
Work Activity	Schedule	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
NA						

**IX. Insignificant Activities**

ID No.:	Description	Citation
2-78	Diesel Fuel Tank for Turbine Generator (Clovelly Dome), 8,200 gallons	LAC 33:III.501.B.5.A.3
22-78	Diesel Fuel Tank for Emergency Crude Pump (Clovelly Dome), 8,200 gallons	LAC 33:III.501.B.5.A.3
25-88	Tank 3 – Operations Center – Diesel Tank (Clovelly Dome), 550 gallons	LAC 33:III.501.B.5.A.3
26-88	Tank 4 – Operations Center – Diesel Tank (Clovelly Dome), 4,000 gallons	LAC 33:III.501.B.5.A.3
27-88	Tank 5 – Fourchon Booster Station Diesel Tank, 1,000 gallons	LAC 33:III.501.B.5.A.3
28-88	Tank 6 – Fourchon Booster Station Emergency Generator Diesel Tank (Clovelly Dome), 322 gallons	LAC 33:III.501.B.5.A.3
29-88	Tank 7 – Fourchon Booster Station Dock Diesel Tank, 560 gallons	LAC 33:III.501.B.5.A.3
30-88	Tank 8 – Clovelly Day Tank for Fire Pumps, 80 gallons	LAC 33:III.501.B.5.A.2

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ID No.:	Description	Citation
31-88	Tank 9 – Clovelly Day Tank for Generators, 115 gallons	LAC 33:III.501.B.5.A.2
32-88	Tank 10 – Clovelly Underground Slop Oil Tank by Lab, 2,000 gallons	LAC 33:III.501.B.5.A.3
34-88	Tank 12 – Small Boat Harbor Diesel Tank, 260 gallons	LAC 33:III.501.B.5.A.3
36-89	Day Tank for Operations Center Standby Generator (Clovelly Dome), 94 gallons	LAC 33:III.501.B.5.A.2
37-91	Small Boat Harbor Diesel Tank, 564 gallons	LAC 33:III.501.B.5.A.3
1A	Lab Equipment / Vents	LAC 33:III.501.B.5.A.6

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements																						
ID No.: Description		LAC 33:III.Chapter																				
		5▲	509	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	2121	22	29*	51*	53*	56	59*	
UNF01	LPC, LOOP – Port Complex	1		1	1	1	2				1	1	2				1	2		1	2	
EQT03	1-78, Crude Relief Tank (Clovelly Dome)							1														
EQT04	5-78, Slop Oil Tank (Small Boat Harbor)							2														
EQT06	11-78, Fourchon Booster Station Tank No. 1 – Diesel Fuel							2														
EQT07	12-78, Salt Dome Cavities (9), Piping, and Brine Storage Reservoir (Clovelly Dome)																					
EQT08	13-78, Fourchon Booster Station Tank No. 2 – Diesel Fuel							2														
EQT09	15-78, 805 hp Fourchon Booster Station –Standby Generator				1	1																
EQT11	17-78, 671 hp Operations Center Standby Generator (Clovelly Dome)				1	1																
EQT12	18-78, 860 hp Emergency Crude Transfer Pump (Clovelly Dome)				1	1																
EQT13	19-78, 10 hp Portable Diesel Generator (Clovelly Dome)				1	1																
EQT14	20-78, Clovelly Fire Pump				1	1																
EQT15	21-78, Standby Generator – Brine Storage Reservoir (Clovelly Dome)				1	1																



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		5▲	509	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	2121	22	29*	51*	53*	56	59*	
EQT16	23-88, Tank 1 Operations Center – Gasoline Tank (Clovelly Dome)							1														
EQT17	24-88, Tank 2 Operations Center – Gasoline Tank (Clovelly Dome)							1														
EQT18	35-88, Fire School Pump (Clovelly Dome)				1	1																
EQT19	38-91, Operations Center Fire Pump (Clovelly Dome)				1	1																
EQT20	5-99, Crude Oil Tank Farm Firewater Pump (Clovelly Dome)				1	1																
EQT21	1-07, Emergency Generator				1	1																
EQT22	2-07, Emergency Generator				1	1																
EQT23	3-07, Emergency Generator				1	1																
EQT24	4-07, Emergency Generator				1	1																
EQT25	5-07, Emergency Generator				1	1																
EQT26	6-07, Emergency Generator				1	1																
EQT27	1-99, Tank 6401 (Clovelly Dome) External Floating Roof (EFR)							1														
EQT28	2-99, Tank 6402 (Clovelly Dome)							1														
EQT29	3-99, Tank 6405 (Clovelly Dome)							1														
EQT30	4-99, Tank 6406 (Clovelly Dome)							1														

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ID No.:	Description	LAC 33:III.Chapter																			
		5▲	509	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	2121	22	29*	51*	53*	56	59*
EQT31	6-02, Tank 6409 (Clovelly Dome)							1													
EQT32	7-02, Tank 6410 (Clovelly Dome)							1													
EQT33	8-07, Tank 6403 (Clovelly Dome)							1													
EQT34	9-07, Tank 6404 (Clovelly Dome)							1													
EQT35	10-07, Tank 6407 (Clovelly Dome)							1													
EQT36	11-07, Tank 6408 (Clovelly Dome)							1													
EQT37	12-07, Tank 6411 (Clovelly Dome)							1													
EQT38	13-07, Tank 6412 (Clovelly Dome)							1													
EQT48	22-14, Tank 6413 (Clovelly Dome)		1					1													
EQT40	15-07, Tank 6414 (Clovelly Dome)							1													
EQT49	23-14, Tank 6415 (Clovelly Dome)		1					1													
EQT42	17-10, Tank 6416 (Clovelly Dome)							1													
EQT43	18-10, Tank 6417 (Clovelly Dome)							1													
EQT50	24-14, Tank 6418 (Clovelly Dome)		1					1													
EQT51	25-14, Tank 6419 (Clovelly Dome)		1					1													
EQT52	26-14, Tank 6420 (Clovelly Dome)		1					1													
EQT53	27-14, Tank 6421 (Clovelly Dome)		1					1													
EQT47	1-10, 520 hp Emergency Generator				1	1															

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ID No.: Description		LAC 33:III.Chapter																				
		5▲	509	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	2121	22	29*	51*	53*	56	59*	
FUG01	10-78, Fugitive Emissions (Clovelly Dome)										1				2							

\* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the “Specific Requirements” report specifically states that the regulation is State Only.

**KEY TO MATRIX**

- 1 -The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
- Blank – The regulations clearly do not apply to this type of emission source.

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<b>X. Table 1. Applicable Louisiana and Federal Air Quality Requirements</b>																				
ID No.:	Description	40 CFR 60 NSPS									40 CFR 61			40 CFR 63 NESHAP					40 CFR	
		A	K	Ka	Kb	Db	Dc	GG	KKK	III	A	J	V	A	HH	SS	VV	ZZZZ	64	68
UNF001	LPC, LOOP – Port Complex	1												1						2
EQT003	1-78, Crude Relief Tank (EFR) (Clovelly Dome)			1																
EQT004	5-78, Slop Oil Tank (Small Boat Harbor)			2																
EQT006	11-78, Fourchon Booster Station Tank No 1 – Diesel Fuel			2																
EQT007	12-78, Salt Dome Cavities (9), Piping, and Brine Storage Reservoir (Clovelly Dome)																			
EQT008	13-78, Fourchon Booster Station Tank No 2 – Diesel Fuel			2																
EQT009	15-78, 805 hp Fourchon Booster Station – Standby Generator									2								1		
EQT011	17-78, 671 hp Operations Center Standby Generator (Clovelly Dome)									2								1		
EQT012	18-78, 860 hp Emergency Crude Transfer Pump (Clovelly Dome)									2								1		
EQT013	19-78, 10 hp Portable Diesel Generator (Clovelly Dome)									2								1		
EQT014	20-78, Clovelly Fire Pump									2								1		
EQT015	21-78, Standby Generator – Brine Storage Reservoir (Clovelly Dome)									2								1		

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		A	K	Ka	Kb	Db	Dc	GG	KKK	III	A	J	V	A	HH	SS	VV	ZZZZ	64 68
EQT016	23-88, Tank 1 Operations Center – Gasoline Tank (Clovelly Dome)				2									Subpart CCCCCC applies					
EQT017	24-88, Tank 2 Operations Center – Gasoline Tank (Clovelly Dome)				2									Subpart CCCCCC applies					
EQT018	35-88, Fire School Pump (Clovelly Dome)									2								1	
EQT019	38-91, Operations Center Fire Pump (Clovelly Dome)									2								1	
EQT020	5-99, Crude Oil Tank Farm Firewater Pump (Clovelly Dome)									2								1	
EQT021	1-07, Emergency Generator									2								1	
EQT022	2-07, Emergency Generator									2								1	
EQT023	3-07, Emergency Generator									2								1	
EQT024	4-07, Emergency Generator									2								1	
EQT025	5-07, Emergency Generator									2								1	
EQT026	6-07, Emergency Generator									2								1	
EQT027	1-99, Tank 6401 (Clovelly Dome) External Floating Roof				1														
EQT028	2-99, Tank 6402 (Clovelly Dome)				1														
EQT029	3-99, Tank 6405 (Clovelly Dome)				1														
EQT030	4-99, Tank 6406 (Clovelly Dome)				1														
EQT031	6-02, Tank 6409 (Clovelly Dome)				1														

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		A	K	Ka	Kb	Db	Dc	GG	KKK	III	A	J	V	A	HH	SS	VV	ZZZZ	64	68
EQT032	7-02, Tank 6410 (Clovelly Dome)				1															
EQT033	8-07, Tank 6403 (Clovelly Dome)				1															
EQT034	9-07, Tank 6404 (Clovelly Dome)				1															
EQT035	10-07, Tank 6407 (Clovelly Dome)				1															
EQT036	11-07, Tank 6408 (Clovelly Dome)				1															
EQT037	12-07, Tank 6411 (Clovelly Dome)				1															
EQT038	13-07, Tank 6412 (Clovelly Dome)				1															
EQT048	22-14, Tank 6413 (Clovelly Dome)				1															
EQT040	15-07, Tank 6414 (Clovelly Dome)				1															
EQT049	23-14, Tank 6415 (Clovelly Dome)				1															
EQT042	17-10, Tank 6416 (Clovelly Dome)				1															
EQT043	18-10, Tank 6417 (Clovelly Dome)				1															
EQT050	24-14, Tank 6418 (Clovelly Dome)				1															
EQT051	25-14, Tank 6419 (Clovelly Dome)				1															
EQT052	26-14, Tank 6420 (Clovelly Dome)				1															
EQT053	27-14, Tank 6421 (Clovelly Dome)				1															
EQT047	1-10, 520 hp Emergency Generator									1								1		
FUG001	10-78, Fugitive Emissions (Clovelly Dome)																			

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**XI. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Status	Citation	Explanation
UNF001 LPC, LOOP LLC – Port Complex	Comprehensive Toxic Air Pollutant Emission Control Program LAC 33:III.Chapter 51	Exempt	40 CFR 63.560(a)(2)	Facility is not a major source of toxic air pollutants as defined under LAC 33:III.5103 and 5105.B –Special Provisions
	Chemical Accident Prevention Provisions 40 CFR 68 Chemical Accident Prevention and Minimization of Consequences LAC 33:III.Chapter 59	Does not apply	40 CFR 68.10 LAC 33:III.5901	Facility does not store or process any referenced listed substance greater than the threshold amounts. [LAC 33:III.5901]
	LAC 33:III.1503. Emission Standards for Sulfur Dioxide	Exempt	LAC 33:III.1503.C	All the emission points sources emit SO <sub>2</sub> emissions less than 5 tons/year
	Waste Gas Disposal LAC 33:III.2115	Does not apply	LAC 33:III.2115	Facility does not have nay waste gas streams
EQT004, EQT006, and EQT008 5-78, Slop Oil Tank (Small Boat Harbor), 11-78 and 13-78, Fourchon Booster Station No. 2 Fuel Tank No. 1 and 2	Control of Emissions of Organic Compounds – Storage of Volatile Organic Compounds LAC 33:III.Chapter 21	Does not apply	LAC 33:III.2103.B	Stored material having the maximum true vapor pressure less than the threshold of 1.5 psia
	NSPS, Subpart Ka	Does not apply	40 CFR 60.110a(a)	Does not store petroleum liquids



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**XI. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Status	Citation	Explanation
EQT009, EQT0011, EQT013, EQT015, EQT021 thru EQT26 Emergency Generator Engines	NSPS, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200	Does not apply	40 CFR 60.4200(a)(2)(i) 40 CFR 60.4200(a)(3)	Engines are not fire pumps and were manufactured prior to April 1, 2006 and were not modified or reconstructed after July 11, 2005
EQT012, EQT014, and EQT018 thru EQT020 Fire Pump Engines	NSPS, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60.4200	Does not apply	40 CFR 60.4200(a)(2)(ii) 40 CFR 60.4200(a)(3)	Engines were manufactured prior to April 1, 2006 and were not modified or reconstructed after July 11, 2005
FUG001 10-78, Fugitive Emissions (Clovally Dome)	Control of Emissions of Organic Compounds - Fugitive Emissions Control LAC 33:III.Chapter 21	Does not apply	LAC 33:III.2121.A	Not a listed facility
The above table provides explanation for both the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Section X of this permit				